

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

YEI A. SUN and LIPING M. SUN, husband
and wife; and HAIMING OWEN SUN, an
individual,

Plaintiffs,

v.

ADVANCED CHINA HEALTHCARE, INC.,
a Cayman Islands company; and ALICIA KAO,
an individual,

Defendants.

No. 2:15-cv-01385-JCC

**DECLARATION OF YEI A. SUN
IN OPPOSITION TO ALICIA KAO'S
MOTION TO DISMISS**

NOTE ON MOTION CALENDAR:
November 13, 2015

I, YEI A. SUN, hereby state and declare as follows:

1. I am one of the Plaintiffs in the above-captioned matter. I am competent to testify and make this declaration based on personal knowledge.

2. I have reviewed the declaration filed by Defendant Alicia Kao in support of her motion to dismiss this case.

3. In late December 2010, Ms. Kao came to Washington to discuss and promote investment in Advanced China Healthcare, Inc. ("ACH"). During Ms. Kao's stay, my wife and I hosted Ms. Kao at our condominium in Bellevue, Washington. At the time that Ms. Kao visited, we—I, my wife Liping M. Sun, and our son Haiming Owen Sun—had not decided whether to invest in ACH.

5. Contrary to Ms. Kao's declaration, we had not "already negotiated" the terms of any investment with ACH at the time of her December 2010 visit. We were, however, told that a healthcare venture fund based in Alabama, Brookline Investments, had already engaged in extensive due diligence of ACH and that, as a result, Brookline was investing in ACH.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Hong Kong
Yei A. Sun

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 9th day of November, 2015.


Ashlee Hooten